

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

v.

ERIC MOLIGNARO

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CR. NO. 04-10373-MLW

JOINT MOTION FOR EXCLUDABLE TIME

The United States of America, by Assistant U.S. Attorney Ann Taylor, and the defendant Eric Molignaro, by counsel Miriam Conrad, Esq., jointly move pursuant to 18 U.S.C. § 3161(h)(8)(A) and Local Rule 112.2(A)(2) that the thirty-one (31) day period of time commencing on March 30, 2005, the date of the interim status conference, through April 29, 2005, the date of a scheduled interim status conference, be excluded from computation under the Speedy Trial Act of the time within this case must be tried. As reason therefore, the parties represent that this additional time is necessary for the defendant to review the discovery that has been provided by the government and determine whether to file substantive motions. It is therefore in the interests of justice that the instant motion be allowed.

WHEREFORE, the parties request that the Court enter a written order of excludable

delay covering the period of March 30, 2005 through April 29, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Ann Taylor
Ann Taylor
Assistant U.S. Attorney

ERIC MOLIGNARO
Defendant

By: /s/ Miriam Conrad
Miriam Conrad
Counsel for Eric Molognaro

DATE: April 1, 2005